Winston H. Hickox
Secretary for Environmental Protection

California Regional Water Quality Control Board

Los Angeles Region

Over 50 Years Serving Coastal Los Angeles and Ventura Counties

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Gray Davis
Governor

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: http://www.swrcb.ca.gov/rwqcb4

December 6, 2002

Brian Mossman
Boeing Realty Corporation
3855 Lakewood Boulevard
Building 1A MCD001-0097
Long Beach, CA 90846

NO FURTHER ACTION FOR SHALLOW SOILS, BOEING REALTY CORPORATION, FORMER C-6 FACILITY, PARCEL C, 19503 NORMANDIE AVENUE, LOS ANGELES (FILE NO. 95-036)

Dear Mr. Mossman:

We have reviewed the "Soil Investigation, Shallow Soil Remediation and Screening Level Risk Assessment" (Report) dated March 13, 2002, prepared by Haley & Aldrich. The following information is presented in the Report:

1. The former Boeing C-6 aircraft manufacturing facility began operation in the early 1940's. The C-6 facility consists of approximately 170 acres and was used for aluminum production, aircraft parts manufacturing and warehousing. All operations ceased about 1992 and all buildings and associated surface and subsurface structures have been removed. The former C-6 facility has been subdivided into Parcels A, B, C and D. Boeing has completed the soil investigation at each of the four parcels and has received shallow soil (ground surface to 12 feet below ground surface (BGS)) closure for Parcels A, B and D. Redevelopment of Parcels A and B has been completed and redevelopment of Parcel D is underway.

2. Parcel C is approximately 50.5 acres and included Buildings 1, 2, 3, 19, 20, 32, 36, and 66. Building 1 was approximately 250,000 square feet and was originally used as a carbon baking area when the facility was used as an aluminum production plant. This building was subsequently used as a parts and records storage warehouse. Building 2 was approximately 1,000,000 square feet and was used for aircraft assembly and a parts storage warehouse. Building 3 was approximately 168,000 square feet and housed administrative offices and laboratories. Building 19 was approximately 7,500 square feet and housed the security office and emergency services for the facility. Building 20 served as the vehicle maintenance area. Building 32 contained the cafeteria and meeting hall. Building 36 was approximately 6,000 square feet and was used as a paint and solvent storage area. Building 66 was approximately 200,000 square feet and was used as a warehouse.

3. The Parcel C soil investigation focused on 233 environmental features identified during the review of historical documents, and known and suspected areas of contamination. In addition, open areas where no specific environmental features were known or suspected (such as parking lots and large interior spaces) were also targeted for investigation with numerous soil borings and soil gas sample locations. The comprehensive soil investigation of the shallow (0 to 12 feet BGS) and deep soils has

been completed and the lateral and vertical extent of soil contamination in the shallow and deep soils has been determined and the remediation of shallow soils has been completed.

4. A total of 26 regulated underground storage tanks (USTs) were present in Parcel C. No significant environmental issues were identified for 22 of the 26 former USTs in Parcel C and closure requests have been submitted for the 22 USTs. The Regional Board is the lead agency for this project, and therefore, the Los Angeles City Fire Department referred all USTs to the Regional Board for investigation/closure. The majority of the soil contamination was found in two areas: Buildings 1/36 and Building 2. Four of the USTs (15T, 16T, 17T, and 18T) were located adjacent to the former Buildings 1/36. Shallow soil contamination in this area has been remediated through excavation and excavated soils have been disposed of offsite, as described in paragraph number 5 below. An extensive vapor extraction system is operating to remediate contamination in deep soils. A former clarifier at Building 2 was the primary source of soil contamination at this area. Shallow soil contamination was excavated and disposed of offsite.

5. Approximately 6,000 cubic yards of soils excavated and disposed of offsite at either the Bradley Landfill in Los Angeles, or TPS Technologies in Adelanto. Investigative derived wastes were disposed offsite at either the NuWay Live Oak Landfill in Azusa, or the Chemwaste Management Landfill in Kettleman. All waste manifests are included in the Report in Appendix H. Confirmation soil samples were collected within each excavation to verify that all contaminated soils had been removed, except for two locations: Building 1/36 and Building 2. Contaminated soils deeper than about 20 feet below ground surface (BGS) at Building 1/36 and Building 2, are currently being remediated by extensive vapor extraction systems as part of the deep soil remedial program, which is now underway.

6. The groundwater beneath the facility is contaminated and 26 groundwater-monitoring wells were installed within Parcel C for additional groundwater quality characterization. The groundwater beneath the entire facility is being addressed as part of the overall project. Sources of groundwater contamination are present within Parcel C. Boeing has completed the site-wide groundwater investigation associated with the former operations and groundwater monitoring is continuing and groundwater remediation will be initiated in early 2003.

7. The Office of Environmental Health Hazard Assessment (OEHHA) completed their review of the "Soil Investigation, Shallow Soil Remediation and Screening Level Risk Assessment Report" and provided their written comments to Regional Board staff in a memo dated October 23, 2002 (OEHHA Memo, copy attached). OEHHA's Memo states "The soil investigation, shallow soil remediation, and screening level risk assessment conducted by Haley and Aldrich for the Former Boeing C-6 Site, Parcel C, in Torrance, California is comprehensive, sound, and appropriate for the protection of human health and for the intended commercial/industrial uses of the property."

   The current soil, soil gas and groundwater volatile organic compound (VOC) concentrations were used in the risk assessment, however, extensive additional remediation of VOCs in deeper soils by vapor extraction is continuing and groundwater remediation will be initiated in early 2003, therefore, the concentrations of contaminants will continue to decrease and the corresponding risk associated with the contamination will also continue to decrease until all remediation is completed.

8. The site has been completely re-graded and approximately 250,000 cubic yards of clean imported fill material has been placed onsite. The current ground surface is from 3 feet lower to 5.5 feet higher than the pre-grading ground surface elevation.

Based upon the extensive soil investigation, extensive shallow soil remediation, site-specific risk assessment, the restricted future use of the land for commercial/industrial uses, and with the provision that the information provided to this agency is accurate and representative of site conditions, we have determined that no further action is necessary for the shallow soils at Parcel C. However, if additional contaminated soil is encountered at within Parcel C during future site development activities the Regional Board must be notified within 72 hours. Boeing is required to continue remediation of contamination in deep soils and continue groundwater investigation, monitoring and/or remediation, as required, for the protection and restoration of groundwater resources.

Groundwater monitoring wells within Parcel C are required as part of the site-wide groundwater investigation, monitoring and remediation program, therefore, you are required to maintain all wells. BRC may remove specific monitoring wells with the prior approval of the Executive Officer.

Please call Mr. John Geroch at (213) 576-6737 or Dr. Rebecca Chou at (213) 576-6733 if you have any questions.

Sincerely,

Dennis A. Dickerson
Executive Officer

Attachment: OEHHA Memorandum

cc: Cheryl Ross, Central Basin Municipal Water District
Ted Johnson, Southern California Water Replenishment District
Jeff Nagler, Watermaster – California Department of Water Resources
Jose Reynoso, Los Angeles County Department of Health Services, Water Well Permits/Well Abandonment
Tim Smith, Los Angeles County Department of Public Works, Environmental Programs Division, Underground Storage Tanks
Captain David Soto, Los Angeles City Fire Department, Underground Storage Tank Department
Scott Zachary, Haley & Aldrich